

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

DOLORES (DEE) BARRETT	:	
	:	
V.	:	CIVIL ACTION - LAW
	:	
THE GREATER HATBORO CHAMBER OF COMMERCE, INC.; JOHN J.(BUD) :		NO. 02 -cv-4421
AIKEN, AND MICKEY GLANTZ	:	JURY TRIAL DEMANDED

**PLAINTIFF'S CONCISE STATEMENT
OF UNCONTESTED FACTS**

1. Plaintiff was employed full time as Executive Director of the Greater Hatboro Chamber of Commerce from approximately May 1991 through October 2000.
2. In October 2000 the Chamber offered Plaintiff a job as its marketing director, for half the salary she had been earning as its Executive Director.
3. Plaintiff was presented with a voluntary separation agreement waiving her rights to sue. She did not sign the agreement and was discharged.
4. Defendant John (Bud) Aiken replaced Plaintiff after she was separated from employment, and Aiken was employed by the Chamber of Commerce as its chief executive officer, with a full time assistant.
5. Defendant Chamber never filled the alleged "position" of marketing director which it had offered to Plaintiff prior to her discharge.
6. Plaintiff did not receive any health insurance benefits from the Chamber of Commerce during her employment. Mr. Aiken's health insurance benefits were fully paid by the Chamber when he was its chief executive officer.

7. On or about April 29, 2001 Plaintiff began employment in New Jersey as the Executive Director of the Greater Wildwood Hotel Motel Association and since that time she and her husband have resided in Cape May Court House, New Jersey.

8. All other facts in this case are in dispute.

WHEREFORE, Defendants' Motion for Summary Judgment must be denied.

Respectfully submitted,

AFA2128

Anita F. Alberts Esquire
Counsel for Plaintiff Dolores Barrett
The Atrium Suite 2 West
301 South Main Street
Doylestown PA 18901
(215) 340-0700
FAX (215) 340-2747

CERTIFICATE OF SERVICE

I, Anita F. Alberts, hereby certify that a true and correct copy of the foregoing Plaintiff's Concise Statement of Uncontested Facts were served upon counsel for defendants by First Class Mail, postage prepaid, at the address and on the date stated below.

Sidney L. Gold Esquire
1835 Market Street, Suite 515
Philadelphia PA 19103

Date

Signature